

Air Quality Commission

And Some Thoughts
on Permitting Your
Facility



AQC -- What Do We Do?

- ▶ **The Mission and Duty of the AQC**
Promote the protection, preservation, and enhancement of the ambient air resources of Mecklenburg County, North Carolina.
- ▶ **The Purpose of the AQC**
Provide citizen and stakeholder input to the BOCC, local municipalities, and MCAQ staff through the review and recommendations of air pollution management policies, long range plans, operations, and their budgetary impacts in order to achieve this mission.
- ▶ **This Can Include**
 - Holding public hearings (includes opening comment periods for your permits)
 - Conducting appeal reviews

Permitting!!!

SECTION A				A1
FACILITY (General Information)				
GENERAL INFORMATION				
Legal Corporate/Owner Name:				
Site Name (if different from above):				
Site Address Line 1:				
Site Address Line 2:				
City:		State:		
Zip Code:		County: Mecklenburg County		
CONTACT INFORMATION				
Responsible Company Official Contact:		Corporate Contact:		
Name, Title:		Name, Title:		
Mailing Address Line 1:		Mailing Address Line 1:		
Mailing Address Line 2:		Mailing Address Line 2:		
City:		State:		Zip Code:
Phone No.:		Fax No.:		
E-mail Address:		E-mail Address:		
Highest Ranking Local Official in Mecklenburg County:		Site Contact:		
Name, Title:		Name, Title:		
Mailing Address Line 1:		Mailing Address Line 1:		
Mailing Address Line 2:		Mailing Address Line 2:		
City:		State:		Zip Code:
Phone No.:		Fax No.:		
E-mail Address:		E-mail Address:		
FACILITY (Plant Site) INFORMATION				
Describe nature of (plant site) operation(s):				
SIC Code:		Description of Primary SIC Group:		
NAICS Code:		Description of Primary NAICS Group:		
Facility Coordinates:		X-Coordinate: Y-Coordinate:		
Tax Code Parcel ID No.:				
Operation:	Hours/Shift:	Shifts/Day:	Days/Week:	Weeks/Year:
APPLICATION CLASSIFICATION				
Facility Type:	<input type="checkbox"/> New Facility	<input type="checkbox"/> Existing Permitted Facility	<input type="checkbox"/> Existing Unpermitted Facility	
Facility Classification:	<input type="checkbox"/> Title V	<input type="checkbox"/> Synthetic Minor	<input type="checkbox"/> Non-Title V	
Is there a gasoline dispensing operation on site? <input type="checkbox"/> Yes <input type="checkbox"/> No				
Is your facility subject to 40 CFR 65 "Prevention of Accidental Releases" - Section 112(r) of the Federal Clean Air Act? <input type="checkbox"/> Yes <input type="checkbox"/> No				
Do you claim confidentiality of data? <input type="checkbox"/> Yes <input type="checkbox"/> No				
If Yes, please include both copies: <input type="checkbox"/> Public Copy of Application <input type="checkbox"/> Confidential Application				
Do you request MCAQ to perform an initial/screening model pursuant to MCAQCO 2.1105 - "Determination of Ambient Air Concentrations"? (If Yes, please complete the applicable Section M forms.) <input type="checkbox"/> Yes <input type="checkbox"/> No				

Mecklenburg County Air Quality - Permit Application Page 1 A1 Form, Rev. 12/14

Likely Started Here!

FIRM OR PERSON THAT PREPARED APPLICATION			
Firm Name:		Person Name, Title:	
Mailing Address Line 1:		Mailing Address Line 2:	
City:	State:	Zip Code:	County:
Phone No.:	Fax No.:	E-mail Address:	
ALTERNATIVE PUBLIC NOTICE PROCESSING			
Do you request application processing using an alternative public notice published in the local newspaper? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Pursuant to MCAQCO 1.5213 -- "Action on Application: Issuance of Permit" and at the applicant's expense, proposed permit application approvals may be advertised in a major local newspaper to initiate the required 15 day public comment period. Indicate your preference -- "if yes", MCAQ will contact you upon completion of the draft permit. The applicant must then pay a \$1,000 fee to MCAQ plus newspaper publication fee (alternative notice fee is not due upon application submital). If "no", public notice will be initiated at a future Air Quality Commission meeting.			
SIGNATURE OF RESPONSIBLE COMPANY OFFICIAL			
As specified in MCAQCO Regulation 1.5212 Paragraph (i), all permit applications submitted shall be signed by one of the following (check applicable category):			
<input type="checkbox"/> For Corporations:			
<input type="checkbox"/> by a principal executive officer or at least the level of vice-president, or			
<input type="checkbox"/> by his duly authorized representative if such representative is responsible for the overall operation of the facility from which the emissions described in the permit application originate or will originate			
<input type="checkbox"/> For Partnerships or Limited Partnerships, by a general partner			
<input type="checkbox"/> For a Sole Proprietorship, by the proprietor			
<input type="checkbox"/> For a municipal, state, federal, or other public entity:			
<input type="checkbox"/> by a principal executive officer, or			
<input type="checkbox"/> by a ranking elected official, or			
<input type="checkbox"/> by a duly authorized employee			
The undersigned certifies that all information and statements provided in the application, based on information and belief formed after reasonable inquiry, are true, accurate, and complete.			
Name (typed/print):		Title:	
X Signature (Blue Ink):		Date:	
APPLICATION ATTACHMENTS			
THE FOLLOWING MUST BE INCLUDED OR THE APPLICATION MAY BE RETURNED:			
<input type="checkbox"/> Application Fee	<input type="checkbox"/> Plant Layout	<input type="checkbox"/> Process Flow Charts	
<input type="checkbox"/> Signature	<input type="checkbox"/> Zoning Determination Letter	<input type="checkbox"/> Model Review Fee	
Department Use Only:			
Amount Paid:	Paid Date:		
Check Reference No.:	Payment Receiver's Initials:		
Premise Number:	45 Days After Application Receipt:		
Permit Number:	90 Days After Application Complete:		

Mecklenburg County Air Quality - Permit Application Page 2 A1 Form, Rev. 12/14

Always Remember the Blue Ink!

Permitting!!! Got This in the Mail



AIR QUALITY TITLE V PERMIT

Permit No.	Effective Date	Expiration Date	Modification Date	Replaces Permit Nos.
██████████	██████████	██████████	-	██████████

In accordance with the provisions of the Mecklenburg County Air Pollution Control Ordinance, and by the authority granted under the North Carolina General Statute (NCGS) Chapter 143, Article 21B, and until such time as this permit expires or is modified or revoked, the Permittee is hereby authorized to construct/operate emission sources and control devices as outlined in Parts 1 and 2 of this permit. The purpose of this permit is to assure compliance with the requirements of Title V of the Clean Air Act (CAA) and 40 CFR Part 70.

Permittee Name:

Site Name (if different):

Permitted Facility Location:

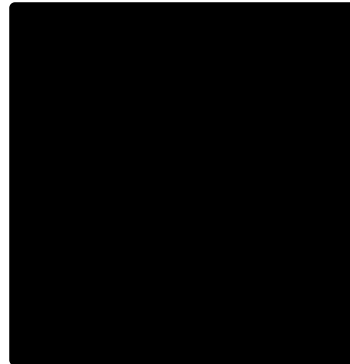
City, State, Zip:

Facility Mailing Address:

City, State, Zip:

Primary SIC Code:

Renewal Application Due:



Program Manager, Air Quality Program

Now What
Do

YOU

Do???

Downside;
failure can
mean non
compliance!

Is it too
late???

Permitting!!! Some Basic Rules

- ▶ Rule #1 – Before you permit anything, talk with LUESA–AQ staff about what you plan to do. Even the small stuff needs this discussion and review!
 - All new equipment, whether addition and/or replacement, needs a review for implications to your permit (or requires a new/modified permit)
 - All changes in products and operations need a review of implications to your permit
- ▶ Discussion with LUESA–AQ staff can sort out what you must do for your permit!
 - New product reviews, new SDS's, revised SDS's, etc.
 - Regulation changes – attainment vs. non-attainment, MACT updates, etc.

Permitting!!! Some Basic Rules

- ▶ Rule #2 – Make sure the application includes all the required data!!! Include how you want to run the device!!!
 - This is your opportunity to detail exactly how emissions will occur. Parameters!!!
 - Small details may be very important – stack height and direction, variations in run speeds, daily or seasonal variations, etc.
 - Present potential and actuals – explain
 - Propose how you can report the details of your emissions – their forms and spreadsheet or those you will use internally!

Permitting!!! Some Basic Rules

- ▶ Rule #3 – **Read your new permit!!!** It is **not the same as the old one!!!** All this goes on everyone's calendars!

Review of Draft Air Quality Permit

August 2009

Transmittal No. X224028
AQ ID: 120-0137
EMF FAC NO. 407354
EMF RO NO. 408224

Permit Section	Conditions or Requirements	Actions Needed	Assigned to:
1	Permitted Activities and Description of Facility and Operations	<ul style="list-style-type: none"> • Permission to operate only units defined in Table 1 of permit. • Two boilers • Coaters and Embossers • Coaters and Embossers are subject to CAM rule • No major source for HAPs 	
2	Emission Unit Identification – Table 1	<ul style="list-style-type: none"> • EU1-1 Superior Boiler, 14.7 mmBTU/hr • EU1-2 Superior Boiler, 14.7 mmBTU/hr • EU2-1 Coating Line #1, drying ovens using carbon absorption unit or uncontrolled (14,100 ft²/min) or • EU2-1 Coating Line #1, drying ovens using thermal oxidizer or uncontrolled (14,100 ft²/min) • EU2-2 Coating Line #2, drying ovens using thermal oxidizer or uncontrolled (17,633 ft²/min) or • EU2-2 Coating Line #2, drying ovens using carbon absorption or uncontrolled (17,633 ft²/min) • EU2-3 Embosser #1, carbon absorption or thermal oxidizer (2400 ft²/min) • EU2-4 Embosser #2, carbon absorption or thermal oxidizer (6613 ft²/min) • EU2-5 Coating Mix Room, carbon canisters or carbon absorption or thermal oxidizer 	

Permit Section	Conditions or Requirements	Actions Needed	Assigned to:
		<ul style="list-style-type: none"> • EU2-14 Storage Tank L, carbon canisters or carbon absorption or thermal oxidizer (12,100 gallons) • EU2-15 Storage Tank M, carbon canisters or carbon absorption or thermal oxidizer (11,542 gallons) • EU2-16 Storage Tank N, carbon canisters or carbon absorption or thermal oxidizer (11,539 gallons) 	
3	Identification of Exempt Activities – Table 2	List of exemptions is found in the permit application. Emissions from these devices must be reported annually. An updated list must be kept at the site and submitted to MADEP when updated.	Gordon Miller
4	Applicable Requirements <ul style="list-style-type: none"> • Emissions Limitations and Restrictions – Table 3 • Compliance Demonstrations <ul style="list-style-type: none"> • Monitoring/Testing Requirements – Table 4 • Record Keeping Requirements – Table 5 • Reporting Requirements – Table 6 • General Applicable Requirements • Requirements Not Currently Applicable – Table 7 	<ul style="list-style-type: none"> • EU1-1 and EU1-2 (Superior Boilers) – Natural gas fired only <ul style="list-style-type: none"> • NOx limited to 1.96 lbs/hr (each source) • SO2 limited to 0.0084 lbs/hr (each source) • CO limited to 0.49 lbs/hr (each source) • VOC limited to 0.039 lbs/hr (each source) • PM limited to 0.196 lbs/hr (each source) & 0.10 lbs/mmBTU • EU2-1 (Coater #1) w/100% capture <ul style="list-style-type: none"> • Coatings limited to 23.0 lbs/hr or 62.92 tons/yr (rolling) • NOx limited to 4.38 tons/yr • SO2 limited to 0.0263 tons/yr • CO limited to 0.9198 tons/yr • VOC limited to 0.254 tons/yr • PM limited to 0.5256 tons/yr • EU2-2 (Coater #2) w/100% capture <ul style="list-style-type: none"> • Coatings limited to 4.4 lbs/hr or 9.6 tons/yr (rolling) • NOx limited to 1.2931 tons/yr • SO2 limited to 0.0078 tons/yr • CO limited to 0.2716 tons/yr • VOC limited to 0.075 tons/yr • PM limited to 0.1552 tons/yr • EU2-1 & EU2-2 Cleaning Solvent <ul style="list-style-type: none"> • 7510 lbs VOC/month (both coaters) • EU2-3 (Embosser #1) 	

Permitting!!! Some Basic Rules

- ▶ Rule #4 – Make every reporting, internal and external, a critical priority in your organization!

- What is your time period – monthly at longest
- Data resources – who and when, back-ups too
- Being a fanatic is important!!!
- Create a calendar with timetables along with the “WHO” part!

TABLE D VOC EMISSION SUMMARY FORM											
FACILITY AREA	PERMITTED EMISSIONS		PRODUCT THROUGHPUT		BASIS	MONTHLY UNCONTROL VOC	EFFICIEN CY	AFTER CONTROL VOC (Lbs)		AFTER CONTROL VOC (tons)	
	Lb/Hr	Tpy	Value *	Units				(Lbs) *	Current Month	12 Month Total	Current Month
Cooling Line 1 Carbon System	23	62.92	163346.30	Reams	Calc	332840.0000	38.7	506.3000	71478.2000	2.5351	35.7331
Cooling Line 2 Carbon System			158.40	Hours	Calc	517.3852	38.7	6.7338	1048.3231	0.0000	0.0000
Cooling Line 1 Water Based			117.34	Reams	Calc	311.6154	N/A	4.0510	130.3230	0.0000	0.0000
Cooling Line 2 Water Based			1.07	Reams	Calc	291.2266	N/A	3.7855	1028.10	0.0000	0.0000
Cooling Line 1 Afterburner	4.4	3.6	1195.10	Reams	Calc	31.3000	N/A	0.0000	0.0000	0.0000	0.0192
Cooling Line 2 Afterburner			53.60	Reams	Calc	0.0000	33.0	0.0000	38.3640	0.0000	0.0000
Cooling Line 1 Uncontrolled			32343.84	Reams	Calc	853.6185	N/A	853.6185	10668.7525	0.4238	5.5444
Cooling Line 2 Uncontrolled			419.31	Hours	Calc	0.0000	33.0	0.0000	0.0000	0.0000	0.0000
Emboss No 1 Carbon System	0.17	0.74	0.00	Reams	Factor	0.0000	33.8	0.0000	0.0000	0.0000	0.0000
Emboss No 1 Afterburner			0.00	Hours	Factor	0.0000	34.1	0.0000	0.0000	0.0000	0.0000
Emboss No 2 Carbon System	0.68	2.98	0.00	Reams	Factor	0.0000	0.0	0.0000	0.0000	0.0000	0.0000
Emboss No 2 Afterburner			0.00	Hours	Factor	0.0000	33.0	0.0000	0.0000	0.0000	0.0000
Uncontrolled			157.42	Reams	Factor	62.1410	0.0	62.1410	2117.3330	0.0311	1.0590
Mix Room	2.3	10.1	N/A	N/A	Permit	1711.2000	N/A	1711.2000	20032.8000	0.8556	10.0464
Wastewater	--	5.74	36518.00	Gallons	Meas/Calc	0.2522	N/A	0.2522	5.5325	0.0001	0.0028
Wet End Building	--	2.26	N/A	N/A	Permit	332.8415	N/A	332.8415	4482.3508	0.1914	2.2415
Solvent Cleaning Inside 300 Gal	0.53	2.25	150	Pounds	Meas/Calc	2253.1500	38.7	23.2910	312.4368	0.0146	0.1562
Outside (max 15 gal)	0.68	0	0	Pounds	Meas/Calc	0.0000	N/A	0.0000	0.0000	0.0000	0.0025
IPA 0 Gallons			3.755	Pounds	Meas/Calc	3.7550	N/A	3.7550	45.0600	0.0000	0.0002
E Acetate 0.5 Gal	0.014	0.014	4.1300	Pounds	Meas/Calc	4.1300	33.0	0.0413	0.4356	0.0000	0.0002
Metallizers 5 Gal	0.5	0.5	0.0000	Pounds	Meas/Calc	0.0000	N/A	0.0000	0.0000	0.0000	0.0000
Degreaser 0.1 Lbs			57360.00	Therms	Meas/Calc	40.2361	N/A	40.2361	443.0243	0.0201	0.2245
Combustion Sources Combined	Total	1.0838									
Ctr #1 Dryers	0.058	0.2540									
Ctr #2 Dryers	0.011	0.0750									
Boiler (#1, #2)	0.078	0.3414									
Afterburner	0.0243	0.1083									
Space Heaters	--	0.3105									
Emergency Gen. - NG	0.12	0.0186	0.6000	Hours	Emission Factor	0.0720	N/A	0.0720	0.8040	0.00004	0.0004
Total Permitted Tons			103.67			TOTAL MONTHLY EMISSIONS		*****		54.8562	
HAP EMISSION SUMMARY FORM											
FACILITY AREA	PERMITTED EMISSIONS		PRODUCT THROUGHPUT		BASIS	PROCESS HAP	VW HAP	AFTER CONTROL HAP (Lbs)		AFTER CONTROL HAP (tons)	
	Lb/Mo	Tpy	Value	Units				Current Month	12 Month Total	Current Month	12 Month Total
Coaters/SolRec/W	4000	2	267070.18	Reams	Calc	0.0000	0.0031	0.0031	1.2628	0.0000	0.0006
NG-Fired units			57360.00	Therms	(d)	10.3104	N/A	10.3104	121.5753	0.0055	0.0608
Oil-Fired units			0.2000	Hours	(e)	0.0003	N/A	0.0003	0.0035	0.0000	0.0000028
TOTAL HAPS								10.3138	122.8422	0.00546	0.0614
OZONE EMISSIONS											
FACILITY AREA	PERMITTED EMISSIONS		PRODUCT THROUGHPUT		BASIS	PROCESS OZONE	AFTER CONTROL OZONE (Lbs)		AFTER CONTROL OZONE (tons)		
	Lb/Hr	Tpy	Value	Units			Current Month	12 Month Total	Current Month	12 Month Total	
Facility-Wide	4.26	16.7	421.147	Hours	Calc	86.1610		86.1610	784.2430	0.04409	0.3321
Note: Combustion Source Factors:											
a) 0-115,194 therms multiply factor: 0.00063524;											
b) 115,194-2,035,648.9 therms multiply factor: 0.00036190;											
c) > 2,035,648.9 therms multiply factor: 0.00026667;											
d) For NG-fired units, Total HAP = therms x 0.00018824											
e) For Oil-fired unit, Total HAP = gallons x 0.00008148 (Gallons = Hrs x 18.3 gph)											
*Beginning with January 2010, the CV-2 table was incorrect and indicated that material was 1% VOC -- when diluted, it is 0.6446% VOC. Correction included in this report through today											

Summary

- ▶ AQC is here to help – we are the community
- ▶ Get permitting and get it right!!!
- ▶ Remember – this is your permit to operate!!!
- ▶ Basic Rules –
 - Rule #1 – Before you permit anything, talk with LUESA-AQ staff about what you plan to do. Even the small stuff needs this discussion and review!
 - Rule #2 – Make sure the application includes all the required data!!! Include how you want to run the device!!!
 - Rule #3 – *Read your new permit*!!! It is not the same as the old one!!!
 - Rule #4 – Make every reporting, internal and external, a critical priority in your organization!



An Air
Pollution
Manager
Selfie!!!

Being a Fanatic is Important and Acceptable!!!

PARTING THOUGHT